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**From:** Bill <wsymms@peak.org>  
**Sent:** Monday, March 16, 2015 11:12 AM  
**To:** comment@boardmantohemingway.com  
**Subject:** B2H DEIS Comments from Oregon California Trails  
**Attachments:** Boardman to Hemingway Final.odt

Attached is the response from the Oregon California Trails Association.  
Your consideration is appreciated.

William R Symms  
Oregon/California Trails Association

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March 15, 2015

## B2H DEIS Response

For years now the Oregon National Historic Trail has been under attack by forces of large business with the assistance in some cases by the Federal and State governments with the end result that much of the trail setting has been lost to wind farm projects and transmission lines. I have written several letters of concern during the scope of the project which I have been involved in since the first meeting in La Grande. Our concerns have not been addressed or even considered by the BLM. The sheer size of the project and all the paper work would discourage most people from even responding as it is confusing and even contradictory at times. I will have to say that I am discouraged as well but for a different reason. It is time to say enough is enough.

After reading all 275 pages of the BLM Manual 6280 Inventory and Impacts Analysis for National Historic Trails and Study Trails November 2014, I have reached the following conclusions:

A. The Oregon Trail will be in the Area of Potential Effect for approximately 240 of the 305 miles of the transmission line project, in some cases closer than 1/4 mile. The Oregon/California Trails Association calls on the BLM to do a better job of protecting the Oregon Trail. That means there could be a lot of damage to the setting of the Oregon Trail. If the transmission line does cross the trail 11 different times, that opens it up for destruction of the trail itself due to roads and other infrastructure making it more easily accessible to off road vehicles and other elements.

B. The Oregon Trail has no protection. There is no mention of a mitigation plan for the Oregon National Historic Trail, Meeks Cutoff, Goodale Cutoff, Benjamin Bonneville Trail, John C. Fremont Trail, Whitman Trail, Upper Columbia River Route, Nathaniel Wyeth Route or any other historic trail in the area of concern.

C. The document admits that the Oregon Trail will be adversely impacted by the project in many areas, so the question is this; with 15,000,000 acres of federal and state land in Oregon why does the power transmission line have to go where the trail is located? There are already right of ways for the power companies so why do they need new ones that destroy the integrity of the trail and the trail experience?

D. So much of the trail setting has already been destroyed by wind farms in north central Oregon, why would you risk the remaining class one areas of the trail still left in Oregon. If this transmission line is placed where the BLM wants to put it, it will destroy the integrity and setting of the trail and there will be no places left in Oregon where there is such a pristine setting, like Well Springs, Blue Mountain Crossing, Flagstaff Hill/Baker City area, Birch Creek ACEC Interpretive Area, Alkali and Tub Springs ACEC Interpretive area. These areas cannot be replaced and there is no other area in the entire length of the Oregon/California Trail that is like these. It is easy to sit in an office and make decisions but you need to be in the field to make decisions and the Oregon/California Trails Association does not believe this has been done by the BLM.

E. The visual line of sight to the trails in this project will be adversely impacted. Part of the trail experience as set forth in all Federal documents deals now with the historical setting of the trail. Some of the best historical settings in the entire trail system occur in this region but have not been addressed or even considered. The issues of setting and trail disturbance by construction and placement of power line towers and access roads and other infrastructure are extremely important considerations for the entire length of this project.

F. BLM Manual 6280 says that the BLM will monitor the trail and provide for best uses of the trail system. If this is their idea of best use then there are some real problems. Putting 200 ft. tall transmission towers and a new road system in the area of the trails is not our idea of best use of the trail. The manual mentions high potential sites and segments for the trail. There are several high potential sites and segments in the project as well as several ACEC's. All of this has been disregarded when deciding the placement of the transmission line. The National Park Service has recognized these areas and are currently studying them for inclusion into the trail system. Much of the trail in these areas is already in the National Trail System.

G. This is a bad plan and a new route needs to be considered as we have advocated from the very beginning of the project but have been ignored. The current plan will lead to very expensive mitigation that is not necessary if the BLM will do the right thing.

I have used 20130829 Historic Trails Map Assembled, for my concerns:

First: Horn Butte/Grasslands Alternative is the worst of all the choices here. This route is going to cross the Oregon Trail at least once and will be 1/2 to 1 1/2 miles from the trail as it travels east to where it joins the BLM Preliminary Preferred Alternative east of Boardman. The reason for our concern is the issue surrounding the Well Springs Interpretive Site and swales on the Boardman Bombing Range and Echo Meadows. Depending on the location, the power line will be visible for the entire length of this transit for about 5 to 20 miles along Immigrant Road. The degree of impact would be determined by the size of the towers used, but no matter which route is used there will be issues of setting and road disturbance. The Longhorn Alternative will probably not work because of the large amount of farm land involved and the Bombing Range Road Variation may have issues with the military. So there are really no good alternatives here, it is a no win situation for someone. Any way they go they will have to cross the Oregon Trail at some point. The Oregon/California Trails Association oppose any of these routes.

Second: According to the maps Emigrant Springs State Park, Meacham Meadows or the Blue Mountain Crossing Interpretive Site are all within the Area of Potential Effect so the Oregon/California Trails Association opposes the current placement unless you can assure us that the towers will not be visible from any of those sites. The towers are up to 195 feet tall and I don't think you will find a tree in the forest there that is that tall, which means the towers will be above the forest. Talk about visibility.

Third: Flagstaff Hill Historical Interpretive Center at Baker City and the Virtue Flat Trail segment: This is a premier BLM facility so I am surprised that they want to put the transmission line anywhere near the facility. I find this quite ironic, that the BLM spends millions of tax payer dollars on interpretive centers and trail studies yet are willing to assist in the degradation of all of that, with this plan. Any route mentioned here will have a huge impact on the trail setting. You need to stay away from this area entirely as the 165-195 ft. tall towers will be

highly visible from the Interpretive Center. Why are we putting this line here? The Oregon/California Trails Association opposes it! The Oregon/California Trails Association recommends very strongly that the Timber Canyon Alternative with accommodation for the sage grouse be used in this area to avoid any and all of the conflicts.

Fourth: Farewell Bend/Birch Creek/Tub Springs/Alkali Springs to Vale segment. This is one area where you can still have a vicarious trail experience and truly understand what the emigrants faced when they came west to settle the Oregon Country. The best route in this area would be the proposed action taking the power line west of Brogan. This route eliminates any possible concerns for this area as far as OCTA is concerned. The next best would be the Willow Creek Alternative. It would eliminate some of the concerns of OCTA. It is true that the towers would be seen in the west at some points, they would not be close and would be no easier to see than the wind farms to the north. The Oregon/California Trails Association is not happy with them either but The Oregon/California Trails Association had no say in those as they are on private land. The last choice would be the South Tub Mountain Alternative. It would be a disaster for the trail. It would affect all of the trail segments in this section and is in direct violation of BLM Manual 6280. You need to come up with another route in this area. The Oregon/California Trails Association strongly opposes this route.

In Chapter 2 pg. 2-1- to 2-15, it discusses transmission line components and their sizes which will be from 100 to 195 ft. in height. This will make them hard to hide and they will have a significant impact on the visual setting of the Oregon Trail no matter how they try to hide them.

In Chapter 3, Pg. 3-729 Lines 20-32: "The influence of the alternatives under consideration would have minimal impact when compared to the qualities of the entire 2,170 mile long Congressional designated trail, the 529.2 miles of trail in Idaho or the 519.5 miles of trail in Oregon. The Proposed Action and the Longhorn, Longhorn Variation, Horn Butte, Timber Canyon, Flagstaff, Burnt River Mountain and Tub Mountain South alternative would have direct, long-term adverse impacts to the visual setting and user experience for the portions of the trail that would be visible within the foreground of the Proposed Action and these alternatives. The 26 miles of the Oregon National Historic Trail that would be visible within the foreground of the Proposed Action and the alternative would be as follows: 23.9 miles within the foreground of the Proposed Action, 1.0 mile within the foreground of the Longhorn Alternative, 1.0 mile within the foreground of the Longhorn Variation, 2.1 miles within foreground of the Horn Butte Alternative, 1.1 miles within the foreground of the Timber Canyon Alternative, 1.2 miles within the foreground of the Flagstaff Alternative, 3.0 miles within the foreground of e Burnt River Mountain Alternative, and 3.2 miles within the foreground of the Tub Mountain South."

The Oregon California Trail Association really feels this was written by someone who has not been out on the trail and has figured all of this by looking at maps in an office. They do not have any idea of the impact this project will have on the trail. If the project crosses the Oregon Trail 11 times as the document states, it is way too often and opens the trail to a lot of destructive issues for both setting and physical damage from a variety of sources. Your Appendix H Supporting Data for Cumulative Impacts on Visual Resources supports these issues and does not speak well for the transmission line placement. The appendix addresses area of foreground, midground and background impacts to the trail and they are massive.

The Sage Grouse has a mitigation plan but the historic trails do not. In fact, there are a number of mitigation and compensatory plans in this document but no frame work for mitigation for a National Historic Trail. I don't understand that at all. With a mitigation plan, why is the sage grouse even considered in placement of the transmission line, it is not threatened or endangered, unlike the Oregon Historic Trail. What are the priorities here? Congress has mandated protection of the trail and The Oregon/California Trails Association does not see that in this document. The Sage Grouse has 15,000,000 acres in Oregon to roam in. The Oregon/California Trails Association just wants to save some of the State of Oregon and U.S. History for future generations so they can learn about their heritage, the same as we have been able to do. Sometimes I feel we are not good stewards of this land. We have a chance to make a difference and it is most often easier to take a pass and hope the next group will do better. We are running out of chances for some things and this is one of them.

After reading Appendix B - Transmission Line and Substation Components, This project should not even be allowed to take place. The massive amount of ground disturbance will affect the trails, the farms and peoples lives. We can't even go out to do historical research on the trail with metal detectors without a licensed archeologist and this transmission line is going to come in blast, grade and tear up the ground in places that are historically sacred. If we would have used the IPC preferred route in most areas, there would have been minimal impact. The BLM route is an unmitigated disaster for the trail. So I say with great emphasis that the Oregon/California Trails Association is opposed to it in its present form. Every farmer in the State of Oregon and every legislator in the State of Oregon should oppose it as it is not right. The people of the State of Oregon get nothing in return for their investment, only destruction and loss of one of their greatest assets which is their history and a lot of farm land. Appendix B shows that 11,072 acres of land will be lost to this project. Move the transmission line somewhere that does not impact any historical trails or areas and minimal impact on the farm land.

So much of the Oregon National Historic Trail is now dependent on setting to have the vicarious emigrant experience. Large segments have been lost to farming, wind farms and a variety of other enterprises, so in places the only thing left is the setting. Once it is gone, then emigrant trail experience is destroyed forever. The National Park Service understands the importance of setting in regards to preserving the trail experience and the BLM Manual 6280 discusses it as well, so do the right thing and stop this project or consider another route.

The BLM Manual 6250 says "High potential route segments shall be identified and included within the trail wide comprehensive plan as segments of a trail which would afford a high quality recreation experience in a portion of the route having greater than average scenic values or affording an opportunity to vicariously share the experience of the original users of a historic route." The Oregon California Trail Association is not convinced this has happened and call on the BLM to make it happen.

In closing, once the trail experience is gone, which includes the setting, it cannot be replaced, it is gone forever. The Oregon California Trail Association is trying to save some of the best sections of the remaining trail for future generations to come and experience. They need to understand the hardships the emigrants experienced to develop the American West. Imagine if you will, sitting at Tub Springs in August having a picnic lunch. It is hot, the dust devils are swirling and your animals are dying, your kids are sick, your wife is about to kill you for making her come to this desolate landscape. You can almost see and hear the oxen straining at

the yoke pulling the wagons of the next group behind you because yes there were traffic issues even then; with everything everything needed start a new life in Oregon. It is so quiet and so dry that you wonder if they lied to you back home about the promised land of Oregon. You are starting to question if you made the right choice in subjecting you family to this journey. Then lunch is over and it is back to walking mile after mile. It is a very powerful picture. Now visualize the same picture only put a 200 foot tall transmission tower and the power lines hanging down by the trail. What does that do to the experience. Please make the right and intelligent choice in the transmission line placement.

Thank you,

William R. Symms

Oregon/California Trails Association  
Northwest OCTA Preservation Officer